Reply to comment of Gordon Gibby

https://ecfsapi.fcc.gov/file/1071540521688/FCCCommentJuly2019.pdf

This latest filing serves to prove the point that all amateur radio communications must be open for over the air understanding by anyone listening, including members of the general public. No amateur radio communications should require the lengths the above comment suggests to enable a listener to understand the content of the message.

The filing seeks to "prove" over the air decoding of a single mode, Pactor. is possible while ignoring the broader intent of RM-11831, which is all modes must be open to understanding by simply owning the proper equipment or digital decoding software. Once again opponents of open amateur radio communications choose to make the RM all about the Winlink system and Pactor.

The "proof" in this filing is riddled with qualifiers to get to an understandable message. See the original version of the article "Spying on Winlink v2" [1], which is significantly different than the abbreviated version filed.
To wit:
1. IF all packets are not copied with 100% accuracy no decode is possible.
2. IF the calls of the stations involved are not known in advance no decode is possible.
3. IF the monitoring station is not closely in sync (milliseconds) with the sending stations no decode is possible. This part is "is largely luck!!!!" according to the author.
3. IF a widely dispersed network of receiving stations are able to copy the packets, and
4. IF custom software is written to combine all the received "diversity" packets, and
5. IF any compression is applied, and the method known, decoding *may* be possible.

A better demonstration, or "proof", would be a random over the air decode of any Winlink mode, not just Pactor. This entire filing required a lot of work to produce but only served to show Winlink modes can not be practically decoded over the air. The title of the original article "Spying on Winlink" and the constant use of the words, spying and snooping, throughout the document implies the transmissions are secret (spying) or private (snooping). Why should any modes in the amateur service require spying, or snooping, when the service is supposed to be open to anyone listening?

The author also mentions that over the air monitoring is not necessary since Winlink provides an internet accessible viewer "window" for *most* messages on the system. Unfortunately the viewer is only open to licensed amateurs, and not the general public, due to privacy concerns expressed by some Winlink clients. If the information isn't available to the general public due to "privacy" concerns it really doesn't belong on amateur radio. Recent information suggests that ARSFI/Winlink never intended to keep the viewer open, even to licensed amateurs, "After speaking directly with a Winlink representative, we have learned that this is expected to be a temporary move to meet requirements that were the result of a complaint filed with the FCC regarding compression being confused with encryption. They assured us they are working on a solution and reiterated they believe this is ONLY TEMPORARY"[2]. The rest of the referenced white paper contains more statements that conflict with

1 https://www.qsl.net/nf4rc/2019/SpyingOnWINLINKV2.pdf
2 https://amrron.com/2019/05/23/amrron-temporarily-suspends-the-use-of-winlink-system-white-paper/

what Winlink is publicly saying, and more references to “a reasonable expectation of privacy”. Nothing in amateur radio should be private, yet this white paper, including statements attributed to Winlink, indicate the reverse is true.

I would encourage the Commission to request, and investigate, the messages that traversed the Winlink HF gateways for the week preceding the opening of the “viewer” through the week after and compare them with the complaint filed with the EB; which was approximately 150 pages of violations recovered in the opening hours of the viewer. Winlink may be trying to clean up their system now but the abuse has been largely hidden for several decades. To continue to allow modes that are not understandable by other amateurs, or the public, damages the integrity of the service.

Thank you

Ron Kolarik
ARS K0IDT